

1 MARK E. FERRARIO
2 Nevada Bar No. 1625
3 CHRISTOPHER R. MILTENBERGER
4 Nevada Bar No. 10153
5 GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: ferrariom@gtlaw.com; miltenbergerc@gtlaw.com

7 **JOEL M. EADS** (*pro hac vice*)
8 GREENBERG TRAURIG, LLP
9 2700 Two Commerce Square
10 2001 Market Street
11 Philadelphia, PA 19103
12 Telephone: (215) 988-7800
13 Facsimile: (215) 988.7801
14 Email: eadsj@gtlaw.com

12 *Counsel for Defendants Jeffery L. Taylor, Don L. Taylor,
L. John Lewis, S. Randall Oveson, and Gannon Giguere, and for
Nominal Defendant Eco Science Solutions, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 HANS MENOS, derivatively on behalf of
ECO SCIENCE SOLUTIONS, INC.,

Case No. 3:17-CV-00662-LRH-VPC

Plaintiff,

Y.

20 JEFFERY L. TAYLOR, DON L.
21 TAYLOR, L. JOHN LEWIS, S.
RANDALL OVESON, and GANNON
GIGUIERE.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANTS AND NOMINAL
DEFENDANT TO RESPOND TO
AMENDED COMPLAINT**

(First Request)

Defendants.

and

24 ECO SCIENCE SOLUTIONS, INC.,
25 Nominal Defendant

STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS AND NOMINAL DEFENDANT TO RESPOND TO AMENDED COMPLAINT

3 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Jeffery L. Taylor, Don L.
4 Taylor, L. John Lewis, S. Randall Oveson and Gannon Giguiere (collectively, "Defendants") and
5 Nominal Defendant Eco Science Solutions, Inc. ("Nominal Defendant"), by and through their
6 counsel, the law firm of Greenberg Traurig, LLP, and Plaintiff Hans Menos, by and through his
7 counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A.,
8 hereby stipulate and agree to extend the deadline for the Defendants and the Nominal Defendant
9 to respond to the Amended Complaint [Dkt 49] in this action by approximately seven (7) days,
10 through and including **Monday, February 11, 2019**, and request that the Court enter an order
11 approving the same.

12 Counsel for Defendants and Nominal Defendant have requested additional time to
13 coordinate their responses in other matters arising out of the same facts and circumstances
14 pending in multiple, different jurisdictions; and to prepare a response and defense that best
15 promotes convenience, economy and consistency and avoids prejudice to any defendant; and
16 Plaintiffs' counsel have agreed to the extension as a professional courtesy.

17 | //

18 | //

19 | //

20

21

22

23

24

25

26

27

28

1 This is the first stipulation for an extension of time for any of the Defendants or the
2 Nominal Defendant to respond to the Amended Complaint.

3 Dated: January 14, 2019

Dated: January 14, 2019

5 By: /s/ Christopher R. Miltenberger
6 Mark E. Ferrario
7 Christopher R. Miltenberger
8 GREENBERG TRAURIG, LLP
9 10845 Griffith Peak Drive
10 Suite 600
11 Las Vegas, NV 89135

12 Joel M. Eads
13 GREENBERG TRAURIG, LLP
14 2700 Two Commerce Square
15 2001 Market Street
16 Philadelphia, PA 19103

17 *Attorneys for Defendants and*
18 *Nominal Defendant*

5 By: /s/ Patrick R. Leverty

6 Patrick R. Leverty
7 LEVERTY & ASSOCIATES LAW CHTD.
8 832 Willow Street
9 Reno, NV 89502

10 Phillip Kim
11 THE ROSEN LAW FIRM, P.A.
12 275 Madison Avenue, 34th Floor
13 New York, NY 10016

14 *Attorneys for Plaintiff*

15 **IT IS SO ORDERED:**

16 
17 **UNITED STATES DISTRICT/MAGISTRATE JUDGE**

18 **DATED: 1/15/2019**